

EXHIBIT K

From: Murphy, Michael D. <mdmurphy@foxrothschild.com>
Sent: Friday, June 6, 2025 10:10 AM
To: Malynn, Todd M.
Cc: Beral, Arash; Gilmore, Jamison; Zollicoffer, Jordan; Follett, Matthew; Cruickshank, AJ; Schiraldi, Michael V.; Arjam, Farshid
Subject: Re: SPAVI v. PCJV USA, LLC, et al.; Case No. 2:24-cv-04546-SB-AGR; Rule 37 Motion

Todd:

I have a feeling I am going to be in here until after 5. Today is not going to work.

Please name a few days next week.

From: Malynn, Todd M. <Todd.Malynn@BlankRome.com>
Sent: Friday, June 6, 2025 7:51:22 AM
To: Murphy, Michael D. <mdmurphy@foxrothschild.com>
Cc: Beral, Arash <arash.beral@blankrome.com>; Gilmore, Jamison <Jamison.Gilmore@blankrome.com>; Zollicoffer, Jordan <JZollicoffer@foxrothschild.com>; Follett, Matthew <MFollett@foxrothschild.com>; Cruickshank, AJ <AJ.Cruickshank@BlankRome.com>; Schiraldi, Michael V. <MSchiraldi@foxrothschild.com>; Arjam, Farshid <FArjam@foxrothschild.com>
Subject: [EXT] RE: SPAVI v. PCJV USA, LLC, et al.; Case No. 2:24-cv-04546-SB-AGR; Rule 37 Motion

Michael,

Please confirm what time this afternoon you are available to meet and confer, including on Rule 16 matters and the motion for an adequate bond. Thanks.

Regards,
Todd

Todd M. Malynn | BLANKROME
2029 Century Park East | 6th Floor | Los Angeles, CA 90067
O: 424.239.3469 | M: 310.595.0271 | F: 424.389.7610 | todd.malynn@blankrome.com

From: Malynn, Todd M.
Sent: Tuesday, June 3, 2025 11:00 AM
To: Murphy, Michael D. <mdmurphy@foxrothschild.com>
Cc: Beral, Arash <arash.beral@blankrome.com>; Gilmore, Jamison <Jamison.Gilmore@blankrome.com>; Zollicoffer, Jordan <JZollicoffer@foxrothschild.com>; Follett, Matthew <MFollett@foxrothschild.com>; Cruickshank, AJ <AJ.Cruickshank@BlankRome.com>; Schiraldi, Michael V. <MSchiraldi@foxrothschild.com>; Arjam, Farshid <FArjam@foxrothschild.com>
Subject: RE: SPAVI v. PCJV USA, LLC, et al.; Case No. 2:24-cv-04546-SB-AGR; Rule 37 Motion

Michael,

Friday at 5:00 pm?

Attached is a draft joint report to the district court. Please review and let me know if we are authorized to file. Thanks.

Regards,
Todd

Todd M. Malynn | BLANKROME

2029 Century Park East | 6th Floor | Los Angeles, CA 90067

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From: Murphy, Michael D. <mdmurphy@foxrothschild.com>

Sent: Sunday, June 1, 2025 3:06 PM

To: Malynn, Todd M. <Todd.Malynn@BlankRome.com>

Cc: Beral, Arash <arash.beral@blankrome.com>; Gilmore, Jamison <Jamison.Gilmore@blankrome.com>; Zollicoffer, Jordan <JZollicoffer@foxrothschild.com>; Follett, Matthew <MFollett@foxrothschild.com>; Cruickshank, AJ <AJ.Cruickshank@BlankRome.com>; Schiraldi, Michael V. <MSchiraldi@foxrothschild.com>; Arjam, Farshid <FArjam@foxrothschild.com>

Subject: Re: SPAVI v. PCJV USA, LLC, et al.; Case No. 2:24-cv-04546-SB-AGR; Rule 37 Motion

I'm free afternoon of the 6th.

From: Malynn, Todd M. <Todd.Malynn@BlankRome.com>

Sent: Friday, May 30, 2025 7:42:13 PM

To: Murphy, Michael D. <mdmurphy@foxrothschild.com>

Cc: Beral, Arash <arash.beral@blankrome.com>; Gilmore, Jamison <Jamison.Gilmore@blankrome.com>; Zollicoffer, Jordan <JZollicoffer@foxrothschild.com>; Follett, Matthew <MFollett@foxrothschild.com>; Cruickshank, AJ <AJ.Cruickshank@BlankRome.com>; Schiraldi, Michael V. <MSchiraldi@foxrothschild.com>; Arjam, Farshid <FArjam@foxrothschild.com>

Subject: [EXT] RE: SPAVI v. PCJV USA, LLC, et al.; Case No. 2:24-cv-04546-SB-AGR; Rule 37 Motion

Michael,

Please advise whether you are available to conduct our required meet and confer over pre-trial items at 5 pm on either June 4 or June 5.

Regards,
Todd

Todd M. Malynn | BLANKROME

2029 Century Park East | 6th Floor | Los Angeles, CA 90067

O: 424.239.3469 | M: 310.595.0271 | F: 424.389.7610 | todd.malynn@blankrome.com

From: Murphy, Michael D. <mdmurphy@foxrothschild.com>
Sent: Thursday, May 29, 2025 5:01 PM
To: Gilmore, Jamison <Jamison.Gilmore@blankrome.com>; AGR Chambers@cacd.uscourts.gov
Cc: Beral, Arash <arash.beral@blankrome.com>; Malynn, Todd M. <Todd.Malynn@BlankRome.com>; Zollicoffer, Jordan <JZollicoffer@foxrothschild.com>; Follett, Matthew <MFollett@foxrothschild.com>; Cruickshank, AJ <AJ.Cruickshank@BlankRome.com>; Schiraldi, Michael V. <MSchiraldi@foxrothschild.com>; Arjam, Farshid <FArjam@foxrothschild.com>
Subject: RE: SPAVI v. PCJV USA, LLC, et al.; Case No. 2:24-cv-04546-SB-AGR; Rule 37 Motion

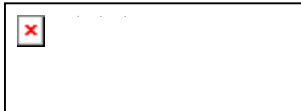
Judge Rosenberg:

I am just now seeing this. It is true that counsel reached out to me what is, essentially, three business days ago with one email sent before a holiday weekend. That is the best way for an email to be missed. Mr. Beral and I are both busy, and I would have assumed he might have tried to call given that he knows sometimes email is not the most efficient way to get responses. He could have also reached out to my colleagues. I find when an email is not answered if I make a quick call, I find it was overlooked. As it was here. Indeed, and moreover, I have had more important items on my task list in this matter, also pending before this Courtroom.

We would ask that the hearing be moved to June 20, 2025.


Thank you,


Mike Murphy



Michael Murphy

Partner

 (213) 213-1211

 (310) 974-2271 (cell)

 mdmurphy@foxrothschild.com

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From: Gilmore, Jamison <Jamison.Gilmore@blankrome.com>
Sent: Thursday, May 29, 2025 4:09 PM
To: AGR Chambers@cacd.uscourts.gov
Cc: Beral, Arash <arash.beral@blankrome.com>; Malynn, Todd M. <Todd.Malynn@BlankRome.com>; Zollicoffer, Jordan <JZollicoffer@foxrothschild.com>; Follett, Matthew <MFollett@foxrothschild.com>; Cruickshank, AJ <AJ.Cruickshank@BlankRome.com>; Schiraldi, Michael V. <MSchiraldi@foxrothschild.com>; Arjam, Farshid <FArjam@foxrothschild.com>; Murphy, Michael D. <mdmurphy@foxrothschild.com>
Subject: [EXT] RE: SPAVI v. PCJV USA, LLC, et al.; Case No. 2:24-cv-04546-SB-AGR; Rule 37 Motion

Dear Judge Rosenberg's Chambers,

Mr. Murphy is now CC'ed on this email chain.

Thank you,

Jamison T. Gilmore | BLANKROME
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+1 (424) 239-3843 | jamison.gilmore@blankrome.com

From: Gilmore, Jamison
Sent: Thursday, May 29, 2025 4:07 PM
To: AGR Chambers@cacd.uscourts.gov
Cc: Beral, Arash <arash.beral@blankrome.com>; Malynn, Todd M. <Todd.Malynn@BlankRome.com>; Zollicoffer, Jordan <JZollicoffer@foxrothschild.com>; Follett, Matthew <MFollett@foxrothschild.com>; Cruickshank, AJ <AJ.Cruickshank@BlankRome.com>; Schiraldi, Michael V. <MSchiraldi@foxrothschild.com>; Arjam, Farshid <FArjam@foxrothschild.com>
Subject: SPAVI v. PCJV USA, LLC, et al.; Case No. 2:24-cv-04546-SB-AGR; Rule 37 Motion

Dear Judge Rosenberg's Chambers,

Per Judge Rosenberg's request, we reached out last week on May 23, 2025, to Mr. Murphy to confer over a new hearing date for our Motion for Sanctions under Rule 37. We asked Mr. Murphy to advise whether any date or time the week of June 2, 2025 does not work for him to have the hearing. As of this date, May 29, we have not heard from Mr. Murphy advising that any dates next week do not work. We respectfully, thus, request that the Court re-set the hearing on our Motion for any date and time that is convenient for the Court. We are prepared to file our reply brief as soon as the Court directs us to file it.

Thank you,

Jamison T. Gilmore | BLANKROME
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